



## **PUBLIC DISCLOSURE**

November 16, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

United Bank & Trust  
RSSD# 990352

823 Broadway  
Marysville, Kansas 66508

Federal Reserve Bank of Kansas City  
1 Memorial Drive  
Kansas City, Missouri 64198

**NOTE:** This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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## **INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING**

This institution is rated: **Satisfactory**  
The Lending Test is rated: **Satisfactory**  
The Community Development Test is rated: **Satisfactory**

United Bank & Trust (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- The bank's net loan-to-deposit ratio (NLTD) is more than reasonable given the bank's size, financial condition, and assessment areas' (AAs') credit needs.
- A substantial majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects an excellent distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.
- Community development (CD) activity reflects adequate responsiveness to CD needs of the bank's AAs.

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. In addition, available Home Mortgage Disclosure Act (HMDA) and CRA aggregate data for the most recent three years (2021, 2022, and 2023) was referenced for additional perspective to gauge credit demand within the bank's AAs. Performance was assessed within the bank's two AAs. The Northeast Kansas AA was assessed using a full-scope review, and the Manhattan Metropolitan AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 13-quarter average NLTD ratio;
- CD loans, qualified investments, and CD services from January 1, 2022 through June 30, 2025;
- Home mortgage loans reported on the bank's HMDA Loan/Application Register originated between January 1, 2023 and December 31, 2024, which included a total of 211 home mortgage loans; and

- A statistical sample of small business and small farm loans originated between January 1, 2024 and December 31, 2024, which included 127 small business loans selected from a universe of 338 loans and 164 small farm loans selected from a universe of 855 loans.

More weight was placed on the bank’s small farm lending performance in the overall evaluation, followed by small business and home mortgage lending. This is determined by the bank’s overall strategic focus on agricultural lending noted within the bank’s loan portfolio composition.

**DESCRIPTION OF INSTITUTION**

The bank is a community bank headquartered in Marysville, Kansas. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of UBT Bancshares, Inc., also located in Marysville, Kansas.
- The bank has total assets of \$879.2 million as of June 30, 2025.
- In addition to its main office and a second branch location in Marysville, the bank operates 14 additional offices located in the Kansas towns of Beattie, Belleville, Clay Center, Concordia, Clyde, Linn, Manhattan, Sabetha, Seneca, and Washington.
- The bank operates 18 cash-only automated teller machines (ATMs) across its branch network throughout Kansas, including three machines at offsite locations.
- As shown in the table below, the bank’s primary business focus is agricultural lending followed by commercial and residential real estate lending.

**Table 1**

<b>Composition of Loan Portfolio as of June 30, 2025</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	15,023	2.3
Farmland	252,708	38.8
1- to 4-Family Residential Real Estate	57,380	8.8
Multifamily Residential Real Estate	5,235	0.8
Nonfarm Nonresidential Real Estate	95,498	14.7
Agricultural	147,400	22.6
Commercial and Industrial	56,717	8.7
Consumer	11,342	1.7
Other	10,073	1.5
<b>Gross Loans</b>	<b>651,376</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its October 24, 2022 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA<sup>1</sup>**

### **LENDING TEST**

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the Northeast Kansas AA (full-scope review); and a brief discussion of performance in the Manhattan Metropolitan AA (limited-scope review).

The bank's overall lending test performance is Satisfactory. This conclusion was based on a more than reasonable NLTD ratio, a substantial majority of loans originated within the bank's AAs, as well as reasonable distribution of loans throughout the bank's AAs, and an excellent distribution of loans to individuals of different income levels and to business and farms of different revenue sizes. In determining the overall lending test rating, equal weight was given to each of the performance criteria listed.

### **Net Loan-to-Deposit Ratio**

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, market share, and area where they are located. The bank's NLTD ratio is more than reasonable with performance that exceeds all of the similarly situated institutions and ratios ranging from 51.0 percent to 88.3 percent.

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<sup>1</sup> The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

**Table 2**

Comparative NLTD Ratios June 30, 2022 – June 30, 2025			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			13 Quarter Average
<b>United Bank &amp; Trust Company</b>	Marysville, Kansas	879,203	91.8
<b>Similarly Situated Institutions</b>			
Citizens State Bank	Marysville, Kansas	417,205	88.3
Union State Bank	Everest, Kansas	426,062	79.6
GNBank NA	Girard, Kansas	983,620	74.7
Astra Bank	Scandia, Kansas	423,905	51.0
Guaranty State B&TC	Beloit, Kansas	374,963	78.7

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The bank originated a substantial majority of loans, by number and dollar, inside the AAs.

**Table 3**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Home Improvement	15	100	839	100.0	0	0.0	0	0.0
Home Purchase - Conventional	134	91.2	19,467	85.7	13	8.8	3,252	14.3
Multi-Family Housing	1	100	205	100.0	0	0.0	0	0.0
Other Purpose Closed-End	4	80	442	86.3	1	20	70	13.7
Refinancing	42	97.7	4,362	93.8	1	2.3	290	6.2
<b>Total HMDA related</b>	<b>196</b>	<b>92.9</b>	<b>25,315</b>	<b>87.5</b>	<b>15</b>	<b>7.1</b>	<b>3,612</b>	<b>12.5</b>
<b>Total Small Business</b>	<b>116</b>	<b>91.3</b>	<b>11,376</b>	<b>91.4</b>	<b>11</b>	<b>8.7</b>	<b>1,075</b>	<b>8.6</b>
<b>Total Small Farm</b>	<b>153</b>	<b>93.3</b>	<b>17,483</b>	<b>92.5</b>	<b>11</b>	<b>6.7</b>	<b>1,415</b>	<b>7.5</b>
<b>Total Loans</b>	<b>465</b>	<b>92.6</b>	<b>54,174</b>	<b>89.9</b>	<b>37</b>	<b>7.4</b>	<b>6,102</b>	<b>10.1</b>

*Note: Percentages may not total 100.0 percent due to rounding.*

**Geographic Distribution of Loans**

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs.

**Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes**

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses and farms of different revenue sizes. The bank’s lending has an overall excellent distribution among individuals of different income levels and businesses and farms of different sizes.

**COMMUNITY DEVELOPMENT TEST**

The CD test evaluates the bank’s responsiveness to CD needs of its AAs through CD loans, qualified investments, and CD services, while considering the bank’s capacity and the need and availability of such opportunities in the bank’s AAs.

The bank’s overall CD test performance is Satisfactory and demonstrates adequate responsiveness. A majority of the bank’s CD activities occurred in the Northeast Kansas AA, which is consistent with the level of branching, lending and deposit concentrations among its two AAs. In addition, based on the bank meeting the CD needs of its AAs, consideration was also given to the bank’s CD activities that occurred outside of its AAs, but within the broader statewide/regional area. Table 4 below displays the total number and dollar amount of the bank’s CD activities that have impacted the bank’s AAs since the previous CRA evaluation.

**Table 4**

<b>Community Development Activity - All</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
			<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>
<b>Affordable Housing</b>	1	77	3	1,013	4	8	7	1,021	13
<b>Community Services</b>	0	0	0	0	11	24	11	24	22
<b>Economic Development</b>	97	13,220	0	0	1	2	1	2	36
<b>Revitalization and Stabilization</b>	16	2,053	5	7,505	11	16	16	7,521	11
<b>Outside Activities</b>	0	0	3	750	0	0	3	750	0
<b>Totals</b>	<b>114</b>	<b>15,350</b>	<b>11</b>	<b>9,268</b>	<b>27</b>	<b>50</b>	<b>38</b>	<b>9,318</b>	<b>82</b>

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified

**NORTHEAST KANSAS ASSESSMENT AREA  
NONMETROPOLITAN AREA  
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTHEAST KANSAS AA**

The bank's Northeast Kansas AA consists of Brown, Clay, Cloud, Marshall, Nemaha, Republic, and Washington Counties in their entirety. See Appendix A for an AA map and Appendix B for additional demographic data.

- The AA delineation has changed since the previous CRA evaluation, as the bank has added Republic County to the AA following a bank acquisition. In 2022, the bank acquired three branch locations, with two being located in Cloud County and one location in Republic County.
- Furthermore, due to the 2016-2020 American Community Survey (ACS) release, the composition of the AA census tracts has changed. The AA is comprised of 21 census tracts which include 19 middle- and 2 upper-income census tracts; there are no low- or moderate-income tracts in the AA. At the previous examination, the AA was comprised of 18 census tracts with 1 moderate-, 15 middle-, and 2 upper-income census tracts.
- Tracts in Republic and Washington Counties have been designated as underserved by the FFIEC.
- The bank operates 15 of its 16 full-service banking locations in the Northeast Kansas AA. In late 2023, the bank closed its Sabetha, KS branch due to low activity and close proximity to another branch location. Following the closure, the bank installed an ATM at the location.
- The bank now operates a total of 17 cash-only ATMs across its branch network, including three ATMs at offsite locations.
- According to the June 30, 2024 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank held a 19.3 percent market share of deposits, ranking 1<sup>st</sup> of 28 institutions operating from 69 banking offices throughout the AA.
- To further augment the CRA performance evaluation, two previously conducted interviews with members of the community were referenced to ascertain the credit needs of the area communities, the responsiveness of area banks in meeting those needs, and for perspectives on local economic conditions. One community member represented a local housing development organization, and the other represented an economic development organization.

**Table 5**

<b>Population Change</b>			
<b>Assessment Area: Northeast Kansas</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Northeast Kansas AA	58,296	57,172	(1.9)
Brown County, KS	9,880	9,508	(3.8)
Clay County, KS	8,421	8,117	(3.6)
Cloud County, KS	9,339	9,032	(3.3)
Marshall County, KS	10,005	10,038	0.3
Nemaha County, KS	10,159	10,273	1.1
Republic County, KS	4,806	4,674	(2.7)
Washington County, KS	5,686	5,530	(2.7)
NonMSA Kansas	901,451	872,644	(3.2)
Kansas	2,892,987	2,937,880	1.6

*Source: 2020 U.S. Census Bureau: Decennial Census  
2011-2015 U.S. Census Bureau: American Community Survey*

- The declining population in the AA is similar to the trend noted in rural areas statewide, while the state of Kansas experienced an overall increase in population during the review period.
- The AA has an older population, with people age 65 and older accounting for 21.9 percent of the population, compared to rural areas statewide at 18.6 percent and the state of Kansas at 15.7 percent.

**Table 6**

<b>Median Family Income Change</b>			
<b>Assessment Area: Northeast Kansas</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Northeast Kansas AA	62,721	66,074	5.3
Brown County, KS	57,580	61,535	6.9
Clay County, KS	68,466	67,695	(1.1)
Cloud County, KS	53,363	59,839	12.1
Marshall County, KS	65,474	69,726	6.5
Nemaha County, KS	73,912	81,337	10.0
Republic County, KS	59,554	66,916	12.4
Washington County, KS	61,433	60,699	(1.2)
NonMSA Kansas	62,676	65,183	4.0
Kansas	72,535	77,620	7.0

*Source: 2011-2015 U.S. Census Bureau: American Community Survey  
2016-2020 U.S. Census Bureau: American Community Survey*

*Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.*

- The AA experienced an increase in median family income between 2015 and 2020 which outpaced rural areas statewide but was less than the state of Kansas.
- The portion of LMI families to total families in the AA, at 35.1 percent, was similar to figures for rural areas statewide and the state of Kansas, at 37.2 percent and 35.9 percent, respectively.
- Based on 2016-2020 ACS data, the percentage of families living below the poverty level in the AA was 5.7 percent, which is slightly below both rural areas statewide and the state of Kansas at 8.3 percent and 7.6 percent, respectively.

**Table 7**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Northeast Kansas</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Northeast Kansas AA	59.2	13.1	30.7	53.8	16.2	13.8
Brown County, KS	70.2	8.1	34.3	53.4	20.0	12.2
Clay County, KS	63.0	28.6	38.9	57.8	37.2	19.6
Cloud County, KS	66.2	14.0	27.8	54.3	13.3	15.1
Marshall County, KS	63.4	19.3	36.6	59.8	18.7	16.2
Nemaha County, KS	43.0	1.8	23.2	52.6	7.1	10.5
Republic County, KS	59.2	15.2	30.0	43.1	7.6	10.1
Washington County, KS	46.5	4.4	17.6	47.2	10.1	10.6
NonMSA Kansas	68.2	23.3	34.6	53.9	22.3	14.8
Kansas	75.7	29.8	38.2	58.1	26.8	15.3

*Cost Burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy*

- The housing cost burden for LMI renters and homeowners was slightly lower when compared to other rural areas statewide and the state of Kansas, with the greatest burden among low-income renters overall.
- The median housing value in the AA of \$94,529 was lower than both the other rural areas statewide and the state of Kansas of \$104,213 and \$157,600, respectively.
- A member of the community noted that the area does not experience many new housing construction builds due to a higher cost of materials and few individuals living in the area who could afford new housing.

**Table 8**

<b>Unemployment Rates</b>					
<b>Assessment Area: Northeast Kansas</b>					
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Northeast Kansas AA	3.6	2.5	2.3	2.6	3.2
Brown County, KS	5.2	3.3	2.9	3.6	4.2
Clay County, KS	4.2	2.6	2.6	2.6	3.5
Cloud County, KS	3.4	2.5	2.4	2.5	3.1
Marshall County, KS	3.2	2.2	2.2	2.5	3.2
Nemaha County, KS	3.0	2.0	2.0	2.0	2.6
Republic County, KS	3.4	2.5	2.2	2.3	2.9
Washington County, KS	2.7	2.1	2.3	2.7	3.2
NonMSA Kansas	4.6	2.9	2.6	2.8	3.4
Kansas	5.8	3.4	2.7	2.9	3.6

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- Unemployment figures in the AA have remained relatively stable and consistent during the evaluation period.
- A member of the community indicated that the major employers in the AA include health care, agricultural, local government, and manufacturing.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHEAST KANSAS AA**

**LENDING TEST**

The bank’s performance under the lending test in the Northeast Kansas AA is reasonable. In determining the lending test rating, equal weight was given to each of the performance criteria. The review in the AA consisted of an evaluation of 187 home mortgage loans, 115 small business loans, and 153 small farm loans. For this evaluation, the bank’s agriculture lending was given more weight as this product line represents a majority of the bank’s total loan portfolio. Furthermore, within the evaluation of home mortgage lending, the following sub-products were not evaluated at the individual level due to insufficient volumes to conduct a meaningful analysis: home improvement, multifamily loans, other purpose lines of credit, other purpose closed/exempt, and purpose not applicable loans.

**Geographic Distribution of Loans**

The bank’s geographic distribution of loans reflects an overall reasonable distribution among the different census tracts and dispersion throughout the AA. The distribution of home mortgage, small business, and small farm lending reflected reasonable levels of penetration among the different census tracts within the AA.

### Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. There are no low- or moderate-income census tracts within the AA. The distribution of 2024 home mortgage lending in middle-income census tracts was comparable to aggregate lending by number and dollar volume and was comparable to the demographic figure. Lending in upper-income census tracts was above aggregate lending by number and dollar volume and above the demographic figure.

The geographic distribution of home mortgage lending in 2023 reflected performance consistent with 2024 levels. Furthermore, an evaluation of the dispersion of home mortgage loans did not identify any conspicuous gaps or lapses in lending within the AA.

### Home Purchase Loans

The geographic distribution of home purchase loans is reasonable. The distribution of 2024 home purchase loans in middle-income census tracts was comparable to aggregate lending by number and dollar volume and comparable to the demographic figure, which is the percentage of owner-occupied units in these census tracts. Lending in upper-income census tracts was above aggregate lending by number and dollar volume and was above the demographic figure.

The geographic distribution of 2023 home purchase loans reflected performance consistent with 2024 levels.

### Home Refinance Loans

The geographic distribution of home refinance loans is reasonable. The distribution of 2024 home refinance loans in middle-income census tracts was comparable to aggregate lending by number and dollar volume and comparable to the demographic figure. Lending in upper-income census tracts was comparable to aggregate lending by number and dollar volume and above the demographic figure.

The geographic distribution of 2023 home refinance loans reflected performance consistent with 2024 levels.

**Table 9**

<b>Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography</b>													
<b>Assessment Area: Northeast Kansas AA</b>													
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Owner Occupied Units %</b>
	<b>2023</b>						<b>2024</b>						
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	37	67.3	86.1	3,867	55.0	81.0	45	62.5	81.7	6,387	57.7	79.8	87.7
Upper	18	32.7	13.9	3,170	45.0	19.0	27	37.5	18.3	4,688	42.3	20.2	12.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>7,037</b>	<b>100.0</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>	<b>100.0</b>	<b>11,075</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	19	73.1	84.2	1,692	68.3	83.0	11	78.6	83.4	1,261	76.8	78.3	87.7
Upper	7	26.9	15.8	786	31.7	17.0	3	21.4	16.6	380	23.2	21.7	12.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>2,478</b>	<b>100.0</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>1,641</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	4	50.0	78.1	249	51.7	82.6	6	85.7	80.8	327	91.6	78.0	87.7
Upper	4	50.0	21.9	233	48.3	17.4	1	14.3	19.2	30	8.4	22.0	12.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>482</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>357</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	90.0	0	0.0	94.9	0	0.0	85.7	0	0.0	92.5	75.8
Upper	0	0.0	10.0	0	0.0	5.1	1	100.0	14.3	205	100.0	7.5	24.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>205</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	61	66.3	85.2	5,842	57.0	81.5	63	66.3	82.8	8,173	60.6	80.0	87.7
Upper	31	33.7	14.8	4,399	43.0	18.5	32	33.7	17.2	5,303	39.4	20.0	12.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>92</b>	<b>100.0</b>	<b>100.0</b>	<b>10,241</b>	<b>100.0</b>	<b>100.0</b>	<b>95</b>	<b>100.0</b>	<b>100.0</b>	<b>13,476</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.  
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is reasonable. There are no low- or moderate-income census tracts within the AA. The bank’s lending in middle-income census tracts was comparable to the demographic figure, which is the percentage of businesses operating in these census tracts, and lending in upper-income census tracts was above the demographic figure.

An evaluation of the dispersion of small business lending did not identify any conspicuous gaps or lapses in lending within the AA.

**Table 10**

Distribution of 2024 Small Business Lending By Income Level of Geography					
Assessment Area: Northeast Kansas AA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	78	67.8	6,147	56.5	85.0
Upper	37	32.2	4,728	43.5	15.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	115	100.0	10,876	100.0	100.0

Source: 2024 FFIEC Census Data  
2024 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Small Farm Lending

The geographic distribution of small farm lending is reasonable. There are no low- or moderate-income census tracts within the AA. The bank’s lending in middle-income census tracts was comparable to the demographic figure, which is the percentage of farms operating in these census tracts, and lending in upper-income census tracts was also comparable to the demographic figure.

An evaluation of the dispersion of small farm lending did not identify any conspicuous gaps or lapses in lending within the AA.

**Table 11**

Distribution of 2024 Small Farm Lending By Income Level of Geography					
Assessment Area: Northeast Kansas AA					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	131	85.6	14,660	83.9	87.4
Upper	22	14.4	2,824	16.2	12.6
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>153</b>	<b>100.0</b>	<b>17,483</b>	<b>100.0</b>	<b>100.0</b>

Source: 2024 FFIEC Census Data  
2024 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes**

The bank’s lending has an overall excellent distribution among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of 2024 home mortgage lending to low-income borrowers was comparable to aggregate lending by number volume and was below aggregate lending by dollar volume and below the demographic figure of the percentage of families by income level. Lending to moderate-income borrowers was comparable to aggregate lending by number volume and the demographic figure and was below aggregate lending by dollar volume.

The distribution of home mortgage loans in 2023 was consistent with the level noted in 2024.

Home Purchase Loans

The borrower distribution of home purchase loans is poor. The distribution of 2024 home purchase loans to low-income borrowers was below aggregate lending by number and dollar volume and was below the demographic figure. Lending to moderate-income borrowers was below aggregate lending by number and dollar volume and was comparable to the demographic figure.

The distribution of home purchase loans in 2023 was above the level noted in 2024.

Home Refinance Loans

The borrower distribution of home refinance loans is reasonable. The distribution of 2024 home refinance loans to low-income borrowers was above aggregate lending by number and dollar volume and comparable to the demographic figure. Lending to moderate-income borrowers was comparable to aggregate lending by number volume, below aggregate lending by dollar volume, and was comparable to the demographic figure.

The distribution of home refinance loans in 2023 was consistent with the level noted in 2024.

**Table 12**

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Northeast Kansas AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	4	7.3	11.4	195	2.8	5.9	4	5.6	8.5	171	1.5	4.0	15.3
Moderate	14	25.5	22.5	1,500	21.3	16.6	10	13.9	23.0	909	8.2	17.0	19.8
Middle	16	29.1	22.5	1,891	26.9	24.1	15	20.8	22.0	1,617	14.6	19.7	25.6
Upper	20	36.4	25.1	3,413	48.5	34.9	38	52.8	30.9	7,843	70.8	44.6	39.3
Unknown	1	1.8	18.5	38	0.5	18.6	5	6.9	15.7	535	4.8	14.7	0.0
<b>Total</b>	<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>7,037</b>	<b>100.0</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>	<b>100.0</b>	<b>11,075</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	6	23.1	11.6	168	6.8	6.0	3	21.4	7.9	154	9.4	3.2	15.3
Moderate	3	11.5	21.9	91	3.7	16.7	2	14.3	20.5	143	8.7	14.2	19.8
Middle	4	15.4	28.1	420	16.9	29.3	3	21.4	21.9	252	15.4	20.1	25.6
Upper	11	42.3	28.8	1,502	60.6	36.5	4	28.6	31.1	859	52.3	39.1	39.3
Unknown	2	7.7	9.6	297	12.0	11.5	2	14.3	18.5	233	14.2	23.4	0.0
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>2,478</b>	<b>100.0</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>1,641</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	1	12.5	6.3	11	2.3	1.8	1	14.3	3.8	11	3.1	0.9	15.3
Moderate	0	0.0	12.5	0	0.0	4.7	2	28.6	23.1	46	12.9	12.7	19.8
Middle	3	37.5	28.1	295	61.2	29.4	0	0.0	26.9	0	0.0	18.3	25.6
Upper	4	50.0	53.1	176	36.5	64.2	4	57.1	42.3	300	84.0	66.7	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	3.8	0	0.0	1.5	0.0
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>482</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>357</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	11	12.0	11.6	374	3.7	5.9	8	8.5	8.5	336	2.5	3.8	15.3
Moderate	18	19.6	21.5	1,625	15.9	16.2	14	14.9	22.1	1,098	8.3	16.0	19.8
Middle	24	26.1	24.3	2,676	26.1	25.6	18	19.1	22.7	1,869	14.1	20.1	25.6
Upper	36	39.1	27.3	5,231	51.1	35.8	47	50.0	31.5	9,200	69.3	44.1	39.3
Unknown	3	3.3	15.3	335	3.3	16.4	7	7.4	15.2	768	5.8	16.0	0.0
<b>Total</b>	<b>92</b>	<b>100.0</b>	<b>100.0</b>	<b>10,241</b>	<b>100.0</b>	<b>100.0</b>	<b>94</b>	<b>100.0</b>	<b>100.0</b>	<b>13,271</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2024 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with gross annual revenues of \$1 million or less was comparable to the demographic figure, which represents the percentage of businesses operating in the AA by revenue size. Additionally, 91.3 percent of loans were in amounts of \$250,000 or less, which are credit amounts typically requested by smaller entities and demonstrates the bank’s willingness to meet the needs of small businesses.

**Table 13**

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Northeast Kansas AA					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	78	67.8	5,416	49.8	87.0
<b>Over \$1 Million</b>	24	20.9	4,746	43.6	9.1
<b>Revenue Unknown</b>	13	11.3	713	6.6	3.9
<b>Total</b>	115	100.0	10,876	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	87	75.7	2,770	25.5	
<b>\$100,001 - \$250,000</b>	18	15.7	2,920	26.8	
<b>\$250,001 - \$1 Million</b>	10	8.7	5,186	47.7	
<b>Total</b>	115	100.0	10,876	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	64	82.1	2,017	37.2	
<b>\$100,001 - \$250,000</b>	9	11.5	1,458	26.9	
<b>\$250,001 - \$1 Million</b>	5	6.4	1,941	35.8	
<b>Total</b>	78	100.0	5,416	100.0	
<i>Source: 2024 FFIEC Census Data 2024 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Small Farm Lending

The borrower distribution of small farm lending is excellent. The bank’s lending to farms with revenues of \$1 million or less was comparable to the demographic figure, which represents the percentage of farms in the AA by revenue size. Additionally, 88.2 percent of loans were in amounts of \$250,000 or less, which are credit amounts typically requested by smaller entities and demonstrates the bank’s willingness to meet the needs of small farms. Furthermore, a review of the three-year average aggregate lending data submitted by CRA reporters in the bank’s AA noted a lending distribution of 25.5 percent by number volume and 48.3 percent by dollar volume to small farms. While not a direct comparator as the bank is not a CRA reporter, aggregate lending data was utilized as additional context and indicates limited demand overall for small farm credit in the AA.

This context further supports the bank’s excellent lending performance and with more weight given to small farm lending, the overall excellent rating for this performance criterion is further supported.

**Table 14**

<b>Distribution of 2024 Small Farm Lending By Revenue Size of Farms</b>					
<b>Assessment Area: Northeast Kansas AA</b>					
	<b>Bank Loans</b>				<b>Total Farms</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	132	86.3	13,921	79.6	98.3
<b>Over \$1 Million</b>	13	8.5	3,136	17.9	1.6
<b>Revenue Unknown</b>	8	5.2	427	2.4	0.1
<b>Total</b>	153	100.0	17,483	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	98	64.1	4,278	24.5	
<b>\$100,001 - \$250,000</b>	37	24.2	6,371	36.4	
<b>\$250,001 - \$500,000</b>	18	11.8	6,835	39.1	
<b>Total</b>	153	100.0	17,483	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	88	66.7	3,796	27.3	
<b>\$100,001 - \$250,000</b>	31	23.5	5,281	37.9	
<b>\$250,001 - \$500,000</b>	13	9.8	4,844	34.8	
<b>Total</b>	132	100.0	13,921	100.0	
<i>Source: 2024 FFIEC Census Data 2024 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**COMMUNITY DEVELOPMENT TEST**

The bank’s CD performance is Satisfactory and demonstrates adequate responsiveness to the AA’s CD needs. As illustrated in Table 15, the bank’s CD lending and CD services were most responsive to area economic development needs, while qualified investments were most responsive to revitalization and stabilization needs within the area. The bank’s economic development loans primarily consisted of financing agricultural start-ups to support LMI individuals for purchasing land, buildings, and/or other farm equipment. The bank’s largest donation was given to a community organization that provides and supports essential services throughout the entire AA, although many of these services are targeted to LMI individuals and families and underserved areas of the AA.

**Table 15**

<b>Community Development Activity Assessment Area: Northeast Kansas</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services #</b>
	<b>#</b>	<b>\$(000)</b>	<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
			<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	
<b>Affordable Housing</b>	1	77	1	3	1	5	2	8	13
<b>Community Services</b>	0	0	0	0	9	14	9	14	22
<b>Economic Development</b>	92	12,129	0	0	1	2	1	2	32
<b>Revitalization and Stabilization</b>	16	2,053	3	855	11	16	14	871	11
<b>Totals</b>	<b>109</b>	<b>14,259</b>	<b>4</b>	<b>858</b>	<b>22</b>	<b>37</b>	<b>26</b>	<b>895</b>	<b>78</b>

**MANHATTAN METROPOLITAN ASSESSMENT AREA  
METROPOLITAN AREA  
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE MANHATTAN METROPOLITAN AA**

The Manhattan Metropolitan AA consists of Riley County in its entirety, which is one of the three counties that combine to form the Manhattan, Kansas Metropolitan Statistical Area (MSA). Refer to Appendix A for a map of the AA and Appendix C for additional demographic data and the bank's lending performance.

- There have been no changes to the AA delineation since the previous evaluation; however, the composition of census tracts has changed due to the 2016-2020 ACS release.
- The AA is comprised of 17 census tracts, which include 1 low-, 4 moderate-, 4 middle-, 6 upper-, and 2 unknown-income census tracts. At the previous examination, the AA was comprised of 14 census tracts, which included 2 moderate-, 6 middle-, 4 upper-, and 2 unknown-income census tracts.
- The AA population, based on 2020 census data, was 71,959.
- The AA contains a total of 14,323 families. According to 2016-2020 ACS data, low-income families comprised 19.9 percent of the population, followed by 17.4 percent moderate-, 19.6 percent middle-, and 43.1 percent as upper-income families.
- The bank operates only one branch within the Manhattan Metropolitan AA, which includes a cash only ATM located onsite.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank held a 0.55 percent market share of deposits, ranking 13th of 16 institutions operating from 27 banking offices throughout the AA.

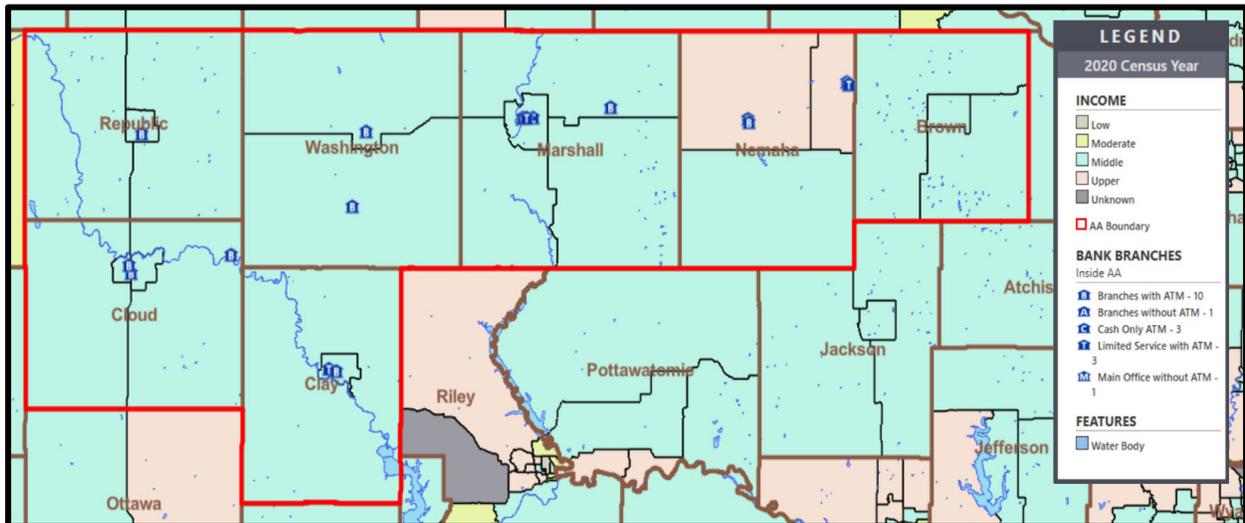
**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MANHATTAN METROPOLITAN AA**

The institution's lending performance in the area is consistent with the institution's lending performance overall.

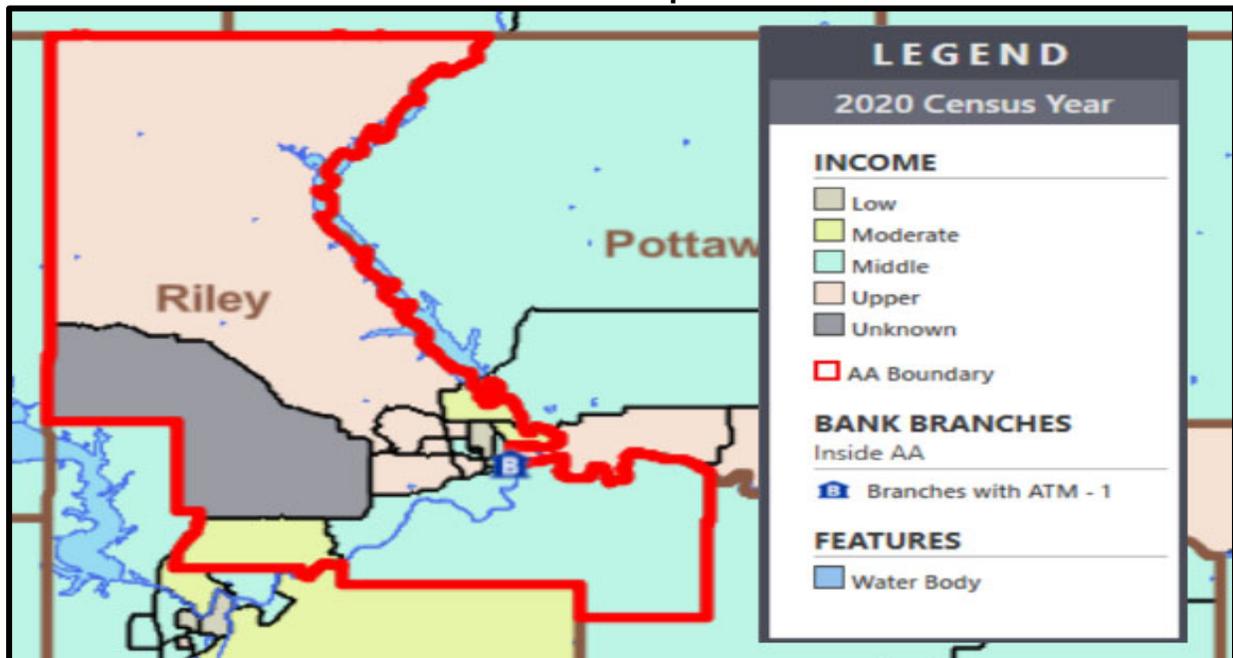
The institution's community development performance in the area exceeds the institution's community development performance for the institution; however, it does not change the rating overall for the institution.

APPENDIX A – MAP OF THE ASSESSMENT AREA

Map A-1  
Northeast Kansas AA



Map A-2  
Manhattan Metropolitan AA



**APPENDIX B – DEMOGRAPHIC INFORMATION**

**Table B-1**

2024 Northeast Kansas AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,327	15.3
Moderate	0	0.0	0	0.0	0	0.0	3,003	19.8
Middle	19	90.5	13,146	86.6	776	5.9	3,890	25.6
Upper	2	9.5	2,036	13.4	88	4.3	5,962	39.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>21</b>	<b>100.0</b>	<b>15,182</b>	<b>100.0</b>	<b>864</b>	<b>5.7</b>	<b>15,182</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	25,252	15,477	87.7	61.3	5,321	21.1	4,454	17.6
Upper	3,533	2,166	12.3	61.3	960	27.2	407	11.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>28,785</b>	<b>17,643</b>	<b>100.0</b>	<b>61.3</b>	<b>6,281</b>	<b>21.8</b>	<b>4,861</b>	<b>16.9</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2,537	85.0	2,215	85.3	215	79.0	107	93.0
Upper	448	15.0	383	14.7	57	21.0	8	7.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>2,985</b>	<b>100.0</b>	<b>2,598</b>	<b>100.0</b>	<b>272</b>	<b>100.0</b>	<b>115</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>87.0</b>	<b>9.1</b>	<b>3.9</b>		
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	874	87.4	861	87.6	12	75.0	1	100.0
Upper	126	12.6	122	12.4	4	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,000</b>	<b>100.0</b>	<b>983</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.3</b>	<b>1.6</b>	<b>0.1</b>		
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B-2**

2023 Northeast Kansas AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,352	15.5
Moderate	0	0.0	0	0.0	0	0.0	3,008	19.8
Middle	19	90.5	13,146	86.6	776	5.9	3,893	25.6
Upper	2	9.5	2,036	13.4	88	4.3	5,929	39.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>21</b>	<b>100.0</b>	<b>15,182</b>	<b>100.0</b>	<b>864</b>	<b>5.7</b>	<b>15,182</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	25,252	15,477	87.7	61.3	5,321	21.1	4,454	17.6
Upper	3,533	2,166	12.3	61.3	960	27.2	407	11.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>28,785</b>	<b>17,643</b>	<b>100.0</b>	<b>61.3</b>	<b>6,281</b>	<b>21.8</b>	<b>4,861</b>	<b>16.9</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2,632	85.0	2,301	85.3	221	78.1	110	93.2
Upper	466	15.0	396	14.7	62	21.9	8	6.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,098</b>	<b>100.0</b>	<b>2,697</b>	<b>100.0</b>	<b>283</b>	<b>100.0</b>	<b>118</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>87.1</b>		<b>9.1</b>		<b>3.8</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	890	87.4	877	87.6	12	75.0	1	100.0
Upper	128	12.6	124	12.4	4	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,018</b>	<b>100.0</b>	<b>1,001</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.3</b>		<b>1.6</b>		<b>0.1</b>
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**APPENDIX C – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES**

**Manhattan Metropolitan AA  
Table C-1**

<b>Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography</b>													
<b>Assessment Area: Manhattan Metropolitan AA</b>													
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Owner Occupied Units %</b>
	<b>2023</b>						<b>2024</b>						
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
	<b>Total Home Mortgage Loans</b>												
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Moderate</b>	2	40.0	26.2	379	40.4	18.0	1	25.0	33.0	168	25.5	18.0	20.2
<b>Middle</b>	2	40.0	24.4	420	44.8	22.7	2	50.0	19.3	357	54.1	19.6	21.6
<b>Upper</b>	1	20.0	48.3	139	14.8	58.3	1	25.0	46.8	135	20.5	61.1	57.9
<b>Unknown</b>	0	0.0	1.1	0	0.0	1.1	0	0.0	1.0	0	0.0	1.3	0.4
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	5	100.0	100.0	938	100.0	100.0	4	100.0	100.0	660	100.0	100.0	100.0

Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table C-2**

<b>Distribution of 2024 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: Manhattan Metropolitan AA</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	
<b>Low</b>	0	0.0	0	0.0	4.7
<b>Moderate</b>	1	100.0	500	100.0	15.6
<b>Middle</b>	0	0.0	0	0.0	39.6
<b>Upper</b>	0	0.0	0	0.0	38.7
<b>Unknown</b>	0	0.0	0	0.0	1.3
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	1	100.0	500	100.0	100.0

Source: 2024 FFIEC Census Data  
2024 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.  
No 2024 Small Farm Lending occurred in this AA.

**Table C-3**

<b>Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Manhattan Metropolitan AA</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2023</b>						<b>2024</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>Total Home Mortgage Loans</b>													
<b>Low</b>	0	0.0	6.0	0	0.0	2.2	0	0.0	4.9	0	0.0	1.6	19.9
<b>Moderate</b>	0	0.0	17.3	0	0.0	11.3	2	50.0	13.6	303	45.9	10.1	17.4
<b>Middle</b>	1	20.0	19.1	139	14.8	18.0	0	0.0	16.4	0	0.0	15.9	19.6
<b>Upper</b>	4	80.0	36.1	799	85.2	45.6	1	25.0	32.6	32	4.8	44.6	43.1
<b>Unknown</b>	0	0.0	21.5	0	0.0	22.9	1	25.0	32.5	325	49.2	27.8	0.0
<b>Total</b>	5	100.0	100.0	938	100.0	100.0	4	100.0	100.0	660	100.0	100.0	100.0

Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.  
Multifamily loans are not included in the borrower distribution analysis.

**Table C-4**

<b>Distribution of 2024 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Manhattan Metropolitan AA</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	0	0.0	0	0.0	89.6
<b>Over \$1 Million</b>	1	100.0	500	100.0	8.9
<b>Revenue Unknown</b>	0	0.0	0	0.0	1.5
<b>Total</b>	1	100.0	500	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	0	0.0	0	0.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	1	100.0	500	100.0	
<b>Total</b>	1	100.0	500	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	0	0.0	0	0.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	0	0.0	0	0.0	
<b>Total</b>	0	0.0	0	0.0	

Source: 2024 FFIEC Census Data  
2024 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.  
No 2024 Small Farm Lending occurred in this AA.

**Table C-5**

2024 Manhattan Metropolitan AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.9	212	1.5	69	32.5	2,849	19.9
Moderate	4	23.5	4,188	29.2	713	17.0	2,494	17.4
Middle	4	23.5	2,809	19.6	431	15.3	2,809	19.6
Upper	6	35.3	6,972	48.7	279	4.0	6,171	43.1
Unknown	2	11.8	142	1.0	19	13.4	0	0.0
<b>Total AA</b>	<b>17</b>	<b>100.0</b>	<b>14,323</b>	<b>100.0</b>	<b>1,511</b>	<b>10.5</b>	<b>14,323</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,106	0	0.0	0.0	731	66.1	375	33.9
Moderate	8,369	2,364	20.2	28.2	5,013	59.9	992	11.9
Middle	8,525	2,525	21.6	29.6	4,727	55.4	1,273	14.9
Upper	12,594	6,774	57.9	53.8	4,217	33.5	1,603	12.7
Unknown	581	46	0.4	7.9	481	82.8	54	9.3
<b>Total AA</b>	<b>31,175</b>	<b>11,709</b>	<b>100.0</b>	<b>37.6</b>	<b>15,169</b>	<b>48.7</b>	<b>4,297</b>	<b>13.8</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	92	4.7	84	4.8	6	3.5	2	6.9
Moderate	303	15.6	290	16.7	10	5.8	3	10.3
Middle	768	39.6	657	37.8	102	59.3	9	31.0
Upper	751	38.7	685	39.4	52	30.2	14	48.3
Unknown	25	1.3	22	1.3	2	1.2	1	3.4
<b>Total AA</b>	<b>1,939</b>	<b>100.0</b>	<b>1,738</b>	<b>100.0</b>	<b>172</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>89.6</b>		<b>8.9</b>		<b>1.5</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	1.2	1	1.3	0	0.0	0	0.0
Moderate	5	6.0	5	6.3	0	0.0	0	0.0
Middle	14	16.9	12	15.0	2	66.7	0	0.0
Upper	63	75.9	62	77.5	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>83</b>	<b>100.0</b>	<b>80</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>96.4</b>		<b>3.6</b>		<b>0.0</b>	

Source: 2024 FFIEC Census Data  
2024 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table C-6**

2023 Manhattan Metropolitan AA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.9	212	1.5	69	32.5	2,849	19.9
Moderate	4	23.5	4,188	29.2	713	17.0	2,494	17.4
Middle	4	23.5	2,809	19.6	431	15.3	2,809	19.6
Upper	6	35.3	6,972	48.7	279	4.0	6,171	43.1
Unknown	2	11.8	142	1.0	19	13.4	0	0.0
<b>Total AA</b>	<b>17</b>	<b>100.0</b>	<b>14,323</b>	<b>100.0</b>	<b>1,511</b>	<b>10.5</b>	<b>14,323</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,106	0	0.0	0.0	731	66.1	375	33.9
Moderate	8,369	2,364	20.2	28.2	5,013	59.9	992	11.9
Middle	8,525	2,525	21.6	29.6	4,727	55.4	1,273	14.9
Upper	12,594	6,774	57.9	53.8	4,217	33.5	1,603	12.7
Unknown	581	46	0.4	7.9	481	82.8	54	9.3
<b>Total AA</b>	<b>31,175</b>	<b>11,709</b>	<b>100.0</b>	<b>37.6</b>	<b>15,169</b>	<b>48.7</b>	<b>4,297</b>	<b>13.8</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	100	4.8	90	4.8	8	4.5	2	6.9
Moderate	330	15.9	314	16.8	12	6.7	4	13.8
Middle	790	38.1	678	36.3	103	57.5	9	31.0
Upper	827	39.8	760	40.7	54	30.2	13	44.8
Unknown	29	1.4	26	1.4	2	1.1	1	3.4
<b>Total AA</b>	<b>2,076</b>	<b>100.0</b>	<b>1,868</b>	<b>100.0</b>	<b>179</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.0</b>		<b>8.6</b>		<b>1.4</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1	1.1	1	1.1	0	0.0	0	0.0
Moderate	7	7.6	7	7.9	0	0.0	0	0.0
Middle	14	15.2	12	13.5	2	66.7	0	0.0
Upper	70	76.1	69	77.5	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>92</b>	<b>100.0</b>	<b>89</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>96.7</b>		<b>3.3</b>		<b>0.0</b>
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## **APPENDIX D – GLOSSARY**

**Aggregate lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**Consumer loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full-scope review:** Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-scope review:** Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Metropolitan area (MA):** A MSA or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**Middle-income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

**Moderate-income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan area (NonMSA):** Any area that is not located within an MSA.

**Other products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-occupied units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

**Upper-income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.